



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

July 10, 2007

Ref: 8EPR-N

Rhonda O'Byrne
District Ranger
Northern Hills Ranger District
2014 North Main Street
Spearfish, SD 57783

RE: Citadel Project Area, Draft Environmental
Impact Statement
CEQ# 20070207

Dear Ms. O'Byrne:

The Environmental Protection Agency (EPA) Region 8 Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Citadel Project Area on the Black Hills National Forest. The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

The proposed activities include vegetative and fuels treatments on a total of 13,035 acres of National Forest System land in the project area. Within the project area, this includes commercial treatment on 10,541 acres, non-commercial treatment on 12,928 acres and prescribed fire on 8,952 acres. The project also includes construction of 18 miles of new roads, reconstruction of 35 miles of existing roads necessary to access timber stands, and closure of 31 miles of unclassified (non-NFS) roads. The key issues identified as the focus for the project are fire hazard in the wildland urban interface (WUI), mountain pine beetle infestation, wildlife habitat and volume of commercial timber produced.

EPA is primarily concerned about impacts to water quality, aquatic resources and wildlife habitat from new road construction. We are concerned that the transportation system is being expanded when currently the existing system and non-system roads are damaging water, soil and habitat resources, as documented in the DEIS. In addition, the DEIS does not describe

how the proposed closure of unclassified roads will be implemented and enforced while residential development adjacent to the national forest and off-highway vehicle use is increasing.

EPA also notes that the DEIS considered and eliminated from detailed analysis an alternative that would not have included new road construction. The DEIS acknowledges that 4.5 of the 18 miles of proposed new roads are not necessary to access stands within or adjacent to the WUI areas. Addressing wildfire hazard in the WUI areas is a focus of the proposed action, and a major public concern. Considering the significant and long-term environmental impacts of new road construction, EPA would like the FEIS to include an explanation of why those 4.5 miles of new road are necessary to the project.

EPA evaluates the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate this DEIS an "EC-2" (environmental concerns, insufficient information) under EPA's enclosed ratings criteria. The EC rating indicates that the reviewer has identified environmental impacts that should be avoided in order to adequately protect the environment. These are described in the attached comments. We also recommend additional analysis and information to fully assess and mitigate all potential impacts of the management actions. A copy of EPA's rating criteria is attached.

EPA appreciates the opportunity to review and comment on the DEIS and your willingness to consider our comments at this stage of your planning process. If we may provide further explanation of our concerns please contact Jody Ostendorf of my staff at 303 312-7814, or me at 303 312-6004.

Sincerely,

/s/ Deborah Lebow
for Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation

Enclosure:

Ratings criteria

